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November 9, 2021

VIA ECF

The Honorable André M. Espinosa
United States Magistrate Judge
United States District Court
District of New Jersey
50 Walnut Street,
Newark, N.J. 07102

Re: Sharma v. Liu, 20-cv-20268 (MCA)(AME)

Dear Judge Espinosa:

We represent Defendant Vivian Liu in the above-referenced civil matter. We write to request an extension of 30 days to respond to Plaintiff's Complaint (D.E. 1-1). This is the first request for an extension of time to file a responsive pleading, and Plaintiff consents to this extension.

Via Order dated October 29, 2021, the Court denied Ms. Liu's motion to dismiss. Thus, Ms. Liu is required to file her Answer on or before November 12, 2021. FRCP 12 (4)(A). Ms. Liu retained us on this matter today. See Substitution of Counsel Form, dated November 9, 2021 (D.E. 27). Thus, we request an extension of 30 days to December 12, 2021 to provide us enough time to review relevant documents and prepare Ms. Liu's responsive pleading.

We thank the Court for its time and attention to this matter.

Sincerely,

/s/Robert Fantone

Robert Fantone

cc: All counsel of record via ECF

So Ordered.

Dated: November 12, 2021

/s/ André M. Espinosa

ANDRÉ M. ESPINOSA

United States Magistrate Judge